

EXHIBIT “E”

Efforts to Improve Election Integrity in Pennsylvania

Purpose: This document lists a few of the thousands of efforts made by citizens in Eastern Pennsylvania to urge our government to improve the accuracy, transparency, and integrity of our elections.

Docu- menter	Type	Description	Submitted to	Date submitte d	Narrative	Final Status	Docket Number/ID Number	NAME OF COUNTY	Why it matters
Houser	Civil Action	PETITION TO OPEN BALLOT : BOX PURSUANT TO 25 P.S. §3261 (A) : AND FOR A CORRECT ACCOUNT OF : THE GENERAL ELECTION FOR THE GOVERNOR AND LIEUTENANT GOVERNOR OF PENNSYLVANIA	Court of Common Pleas, Chester County Courthouse	12/9/22	ORDERED that the Petitions are DENIED and DISMISSED WITH PREJUDICE	Appeal -ed	NO.2022-09186 -EL to NO. 2022-09195- EL	Chester	Court of Common Pleas Judge ruled against the plaintiffs using a different statute than the one that the petitions were filed under. The Board of Elections did not want to hand count the ballots and provide transparency in our election. Used lawfare to make a ruling.
Houser	Plan- tiffs Appeal	Petition to Open Ballot Box : Pursuant to 25 P.S. §3261(a) : and for a correct account of the : General Election for the Governor and Lieutenant Governor of Pennsylvania	THE COMMON- WEALTH COURT OF PENNSYL- VANIA	February 10, 2023	AND NOW, this 10 th day of February, 2023, Trial Court Decision and Order dated December 9, 2022, is VACATED and the matter is REMANDED for further proceedings. Jurisdiction relinquished.	Plan- tiff's favor	No. 1489 C.D. 2022 - No. 1494 C.D. 2022 CASES CONSOLIDATED	Chester	The Chester County Board of Elections improperly certified the election results while the Petitions to open a ballot box remained outstanding.

Houser	Board of Elections Appeal	Petition to Open Ballot Box : Pursuant to 25 P.S. §3261(a) : and for a correct account of the : General Election for the Governor and Lieutenant Governor of Pennsylvania	SUPREME COURT OF PENNSYLVANIA	May 12, 2023	I disagree with the majority's decision to dispose of the merits summarily through a <i>per curiam</i> order vacating the Commonwealth Court's decision below based solely on the contents of the Board's Petition.	Board of Elections favor	No. 80 MAL 2023 - No. 85 MAL 2023	Chester	Ruled under different statutes than what the petitions were filed under. Petitioners followed the PA Statute and filed their petitions according to the law. The funds had to be raised to fight this battle all the way to the PA Supreme Court. The judge at the Commonwealth Court ruled appropriately.
Houser	Civil Action	Sued Commissioners Marion Moskowitz and Josh Maxwell for improperly certifying the election results while the Petitions to open a ballot box remained outstanding.	Court of Common Pleas, Chester County Courthouse	Oct. 3, 2023	Mr. Borton failed to state a claim for relief against the Commissioners' participation in their personal capacities.	Ruled against plaintiff William Borton	NO. 2023 – 06772-MJ	Chester	William Borton's case was dismissed. PA Election Code 25 P.S. Section 3154f states that an election cannot be certified while there are pending recount petitions. 25 P.S. Section 3551 dictates that Moskowitz and Maxwell should be barred from holding public office due to this violation.
Houser	Right to Know Request	Requested the Cast Vote Records for the Nov 3, 2020 election	Chester County Open Records	August 29, 2022	Your request is denied pursuant to Section 308 of the Pennsylvania Election Code. The cast vote record (CVR) is the digital equivalent of the	denied	20220829 Houser RTK Response	Chester	Cast Vote Records are not the contents of the ballot box. This is a total lack of

							contents of ballot boxes, and the Election Code states that the contents of ballot boxes are not public records.					transparency into our elections.
Houser	Right to Know Request	After Heather Honey won her appeal, I again requested the CVR's for the 11/3/2020 election	Chester County Open Records	Feb 1, 2023			Your request is denied pursuant to Article VII, Section 4 of the Pennsylvania Constitution, as the release of the requested record would jeopardize secrecy in voting and the Election Code states that the contents of ballot boxes are not public records.	denied	20230201 Houser RTK Response	Chester		Cast Vote Records are not the contents of the ballot box. This is a total lack of transparency into our elections.

Docu- menter	Type	Description	Submitted to	Date submit- ed	Narrative	Final Status	Docket Number/ID Number	NAME OF COUNTY	Why it matters
Houser	Right to Know Request for CVR's	Appealed	PA Office of Open Records	March 14, 2023	The CVR is the digital equivalent of inspecting the contents of a ballot box, one ballot at a time.	denied	Docket No: AP 2023-0337	Chester	CVR's should be a public record in the interest of transparency.
Houser	RTK for HAVV	All records of Help America Vote Verification, HAVV, requests to the social security administration from 1/1/2020 to present. Keyword HAVV. Including number of requests made per week, and	PA DOS	July 3, 2023	The remainder of your request is denied because the Department of State has determined that it does not have the records that you request in its possession, under its custody or its control based on the information that you provided.	Mostly redacted	Right-to-Know Law Request No. 2023-290	Chester	Mostly redacted, only received HAVV guidelines. The State should have these records.

Houser	RTK Request	<p>Department of Homeland Security between the period beginning January 1, 2020 through the present.”; and (2) “all communications between the office of the Pennsylvania Secretary of State and the Center for Internet Security between the period beginning January 1, 2020 through the present. Include any reports that may have been delivered by the Center for Internet Security to the office of the Pa. Secretary of State.”</p>	PADOS	July 3, 2023	<p>The remainder of your request is denied. In regards to requested item (2), your request is denied because it seeks records regarding computer hardware, software and networks, including administrative or technical records, which, if disclosed,</p>	<p>Your request is granted in part, denied in part</p>	RE: Right-to-Know Law Request No. 2023-298	Chester	Most informative on Albert Sensors in PA
--------	-------------	--	-------	--------------	---	--	--	---------	--

Houser	Right to Know Request	<p>installation of Albert Sensors.</p> <p>2. Please provide a list of counties in Pennsylvania which currently have Albert Sensors installed.</p> <p>3. Please provide documentation of Waiver of Expectation of Privacy for all computer users on networks that have Albert Sensors installed as required under the terms of the Memorandum of Understanding with the Center for Internet Security.</p>	Chester County Open Records	June 30, 2023		would be reasonably likely to jeopardize computer security and critical election infrastructure, are therefore exempt from disclosure under §§ 708(b)(3)(i)-(iii) & 708(b)(4).	Partially redacted	20230602 Houser 7 RTK	Chester	A communication showed that BPro/KnowInk can flip data. A person's registration was changed.
--------	-----------------------	--	-----------------------------	---------------	--	--	--------------------	-----------------------	---------	--

Houser	Right to Know Request	the use of any of these companies: KnowINK/BPro/Tenex.	Chester County Open Records	July 28, 2023	I feel that there were records that were hidden and not made public.	Re-quest Granted	20230724 Houser 9 RTK	Chester	<p>This RTK was an effort to try to find possible information regarding the Jesse Morgan case where completed ballots were transferred from Bethpage New York to Pennsylvania. Those ballots ended up in Chester County and Philadelphia.</p> <p>Jesse Morgan: In total I saw 24 gaylords, or large cardboard containers of ballots, loaded into my trailer. These gaylords contained plastic trays, I call them totes or trays of ballots stacked on top of each other. All the envelopes were the same size. I saw the envelopes had return addresses... They were complete ballots." Jesse went</p>
--------	-----------------------	--	-----------------------------	---------------	--	------------------	-----------------------	---------	--

Efforts to Improve Election Integrity in Pennsylvania **Part 2**

Purpose: This document lists a few of the thousands of efforts made by citizens in Eastern Pennsylvania to urge our government to improve the accuracy, transparency, and integrity of our elections.

Docu- menter	Type	Description	Submitted to	Date submit- ed	Narrative	Final Status	Docket Number/ID Number	NAME OF COUNTY	Why it matters
Houser	Right to Know Request	I am requesting videos from inside all Voter Services offices, satellite offices, temporary office spaces, or any other place used by Voter Services where cast ballots are handled starting with the day that these locations began receiving cast ballots from the USPS, from individuals who walked into these locations to leave the cast ballots with a member of staff, and/or from individuals who filled out a cast ballot at Voter Services or any of the other locations that received or handled cast ballots.	Chester County Open Records	Nov 23, 2022	Your request is denied pursuant to Sections 708(b)(1)(i) and (b)(3) of the RTKL because the disclosure of the requested records would result in the loss of State funds by an agency and would create a reasonable likelihood of endangering the safety or the physical security of a building or infrastructure (65 P.S. § 67.708).	Denied	20221123 Houser 6 RTK Response	Chester	It is believed that there we have chain of custody issues also a lack of transparency in the election process.
Houser	Right to Know Request	I want to know who oversees each step, procedure,	Chester County Open Records	Nov. 9, 2022	The County does not possess records as described in your request. Pursuant to	Denied in part	20221109 Houser RTK Response 1	Chester	Voter Services Policies and Procedures Manual was provided.

		process, and control from the point that a paper ballot is scanned at the polling location to the point where the vote is reported to the state.			Section 705 of the RTKL, the County is not required to create a record that does not currently exist or to compile a record in a manner in which the County does not currently compile, maintain, format or organize a record. See 65 P.S. § 67.705. However, the County has enclosed records which may be responsive to your request.				This response did not provide the information that I was looking for. My vote and my husband's vote was not recorded in the 2020 election. I was hoping to find some answers at Voter Services as to why this happened.
Houser	Right to Know Request	In regards to the 2022 General Election: 1. I am requesting Chester County's written policy or procedure for counting mail-in and absentee ballots without a date or a verifiable signature. 2. I am requesting Chester County's written policy or procedure for the curing of mail-in and absentee ballots	Chester County Open Records	Dec 6, 2022	The County has granted your request and enclosed records responsive to your request. See documents attached hereto as Exhibit A In regard to parts 3 and 4 of your request, the County does not possess records responsive to your request.			Chester	Received a Pre-Canvass of Outer Envelope Document. Was hoping for more specific information. So, it appears that Voter Services might just do as they please regardless of what the Supreme Court directed.

		between the Chester County Board of Elections: Commissioner Marion Moskowitz, Commissioner Josh Maxwell, Commissioner Michelle Kichline, and Karen Barsoum the Director of Voter Services to the Acting Secretary of State Leigh Chapman between the dates of October 21, 2022 to November 10, 2022 regarding the counting of mail-in and absentee ballots without a date or a verifiable signature.								
Houser		On November 3, 2020, I voted in person at my precinct, Uwchlan 7. I turned in my mail-in ballot fully intact and was given a paper ballot. I saw my ballot go into the voting machine to be scanned. I have	PA DOS	Nov. 9, 2022	In regard to part 1 of your request, the responsive records have been provided to you for a previous request. The County has enclosed these records in response to this request and they are attached hereto as Exhibit A. The records have been partially redacted pursuant to Section 708(b)(6) of the RTKL because the records	Your request is granted in part, denied in part	20221109 Houser RTK Response 2	Chester		I had previously received my Signature Page and Numbered List of Voters page proving that I had voted in the 2020 election even though my vote was not recorded. This was once again provided. I was told that this proves that my vote counted. I wanted proof that it

		<p>the poll book signature and the ballot assignment that proves that I voted in person on November 3, 2020. I acquired these through a Right to Know Request in July. However, the SURE system has no record of my voting on November 3, 2020 even though I voted in person at my precinct, Uwchlan 7.</p> <p>I am requesting three documents which are to be certified copies:</p> <ol style="list-style-type: none"> 1. I want visual proof that my vote counted. I will not accept the excuse that it was scanned by the voting machine so that is the proof. 2. I want a full accounting and explanation 			<p>contain personal identification information which is exempt from public access under the RTKL. The records have also been partially redacted under the constitutional right to privacy (Pa. Const. art. I, § 1) and the Voter Registration Act (25 Pa.C.S.A. § 1404(a)(3)).</p> <p>In regard to parts 2 and 3 of your request, a request must seek records, rather than answers to questions, in order to comply with the requirements of 65 P.S. § 67.703. See <i>Simoni v. Brentwood Borough</i>, AP 2017-2260. Therefore, as it relates to parts 2 and 3 of your request, your request is denied pursuant to Section 703 of the RTKL. See 65 P.S. § 67.703. If you have questions regarding the Statewide Uniform Registry of Electors (“SURE”) system, you may direct these questions to the Pennsylvania Department of State.</p>			<p>counted. Did not receive that proof. I was also denied the CVR's in other RTK's.</p>
--	--	---	--	--	---	--	--	---

Houser	Right to Know Request	only to find that their vote is not registered in the Commonwealth System of Record, that is a grave injustice. On February 15, 2023, I filed a Right to Know in Chester County requesting the list of names and accompanying addresses from all of the Mail in Ballots that were returned as undeliverable for the November 8, 2022 General Election between the dates of September 1, 2022 to December 31, 2022. I also requested the list of names and accompanying addresses from all of the returned Mail-in-Ballot applications for all of 2022. On March 27, 2023, Lauren Remaley the Open Records Officer of	Chester County Open Records Appealed to Pennsylvania Office of Open Records	Appeal on April 4, 2023	The County cannot redact such information pursuant to the constitutional right to privacy.	The appeal is granted, and the County is required to provide the requested addresses within thirty days	Docket No.: AP 2023-0773	Chester	Chester County has also denied access to addresses using the PA Constitution as an excuse for privacy in other RTK's that I submitted. It is an ongoing battle for its citizens to acquire transparency in our elections.
--------	-----------------------	--	--	-------------------------	--	---	--------------------------	---------	---

Houser	Right to Know Request	<p>I am requesting the following public records. Please send electronic copies.</p> <p>The printed summary reports of the election results by precinct from the memory sticks of each of the DS450 and DS850 tabulators and any other tabulators that were used to scan mail-in, absentee, provisional, military, adjudicated, and any other ballot tabulated at central scan for the:</p> <ul style="list-style-type: none"> • June 2, 2020 Primary Election • November 3, 2020 General Election • May 18, 2021 Primary Election • November 2, 2021 General Election • May 17, 2022 Primary Election • November 8, 2022 General Election • May 16, 2023 	Chester County Open Records	August 10, 2023	<p>The County does not have printed out election results from specific voting machines at central scan that are saved separately for each machine, results are accumulated from each scanner into the ElectionWare software for county wide results. The memory sticks that are used to get election result files from the ballot scanners into ElectionWare are reformatted and reused from election to election in the same way voting machines are. Therefore, there are no memory sticks that still contain the data that you have requested.</p> <p>To the extent that you construe this response as a denial, you may file an appeal in accordance with Section 1101 for the RTKL, 65 P.S. § 67.1101. If you wish to appeal, you must do so within 15 business days of this response by filing an appeal with the Pennsylvania Office of Open Records, 333 Market St., 16th Floor, Harrisburg, PA 17101-2234. The County reserves the right to</p>	No Records	Reference # R000069-081023	Chester	<p>“The memory sticks that are used to get election result files from the ballot scanners into ElectionWare are reformatted and reused from election to election in the same way voting machines are.”</p> <p>This information is beyond disturbing. Chester County is a well-off county and can well afford new memory sticks. This is a blatant effort to hide data.</p>
--------	-----------------------	---	-----------------------------	-----------------	--	------------	----------------------------	---------	--

		Primary Election				amend this response as permitted by Levy v. Senate of Pennsylvania, 65 A.3d 361, 363–64 (Pa. 2013). Please be advised that this correspondence will serve to close this record with our office as permitted by law.				
--	--	------------------	--	--	--	---	--	--	--	--

Docu- menter	Type	Description	Submitted to	Date submit- ed	Narrative	Final Status	Docket Number/ ID Number	NAME OF COUNTY	Why it matters
Houser	Right to Know Request	(1) all invoices and payment history for the Service Agreement (Soc. No. 2020-LOA-002); (2) Albert Network Monitoring Pre-Installation Questionnaire for Chester County; (3) all invoices and payment history for the Service Agreement (Doc. No. 2020-LOA-002A); and (4) Albert Network Monitoring Pre-Installation Questionnaire for Chester County.” After further discussion and	COMMON- WEALTH OF PENNSYL- VANIA DEPART- MENT OF STATE	August 14, 2023	Department of State has determined that it does not have the records that you request in its possession	No records	Right-to-Know Law Request No. 2023-360	Chester	I have not been able to get evidence that Chester County has Albert Sensors despite the fact that Albert was being shoved on PA Counties by the PA DOS.

Houser	Right to Know Request	<p>clarification of your request you requested: “(1) only the invoices and payment history regarding Chester County related to both the Service Agreement 2020-LOA-002 and Amendment to the Service Agreement 2020-LOA-002A. However, if such invoices were all inclusive and reflected payment for all of the counties and there is no specific record of the invoices and payment history for only Chester County, then [you] will accept that record, but prefer records specifically for Chester County; and (2) the completed Albert Network Monitoring Pre-Installation Questionnaire for Chester County.”</p>	Chester County	Oct. 12, 2023	Chester County Open Records has reviewed its files and has located	granted	R000104-090123	Chester	Under the HA VA Grant and the Election Integrity
--------	-----------------------	--	----------------	---------------	--	---------	----------------	---------	--

		<p>pertaining to grants awarded to Chester County between the dates of January 1, 2020 to present. I prefer electronic documents. For each awarded grant, I am requesting: A copy of the grant</p> <p>A breakdown of the project resources into specific budget categories and the amount allocated to each category</p> <p>The terms and conditions of the grant</p> <p>Grants awarded to Chester County:</p> <p>Help America Vote Act (HAVA) 2020 Election Security Grant for \$291,921.95.</p> <p>Coronavirus Aid, Relief, and Economic Security Act Grant (CARES) 2020 for \$250,151.69.</p> <p>Commonwealth of Pennsylvania</p>	Open Records		<p>responsive records to your request. The records have been partially redacted pursuant to Section 708(b)(6) of the RTKL because the records contain personal information which is exempt from public access under the RTKL. The records have also been partially redacted pursuant to the Internal Revenue Code (26 U.S.C. §§ 6103(a)-(b)).</p> <p>Please log in to the Right to Know Request at the following link to retrieve the responsive records.</p>				<p>Grant, the Commissioners pledged to do voter roll maintenance. Cleaning the voter rolls in Chester County has been lacking as proven by canvassers who bring this data to their attention. They took these funds under false claims.</p>
--	--	--	--------------	--	---	--	--	--	---

Houser	Right to Know Request	I am requesting a copy of the following contracts as well as any previous contracts with those vendors between the dates of January 1, 2020 to present. I prefer electronic documents. Contracts should itemize the goods and services purchased or provided.	Chester County Open Records	Oct. 12, 2023	Chester County Open Records has reviewed its files and has located responsive records to your request. The records have been partially redacted pursuant to Sections 708(b)(6) and (11) of the RTKL because they contain personal identification information and confidential proprietary information which are exempt from public access under the RTKL. The records have also been partially redacted under the constitutional right to privacy (Pa. Const. art. I, § 1)	granted	Reference # R000106-090123	Chester	Looking for Cyber-Security contracts Still using the PA Constitution as an excuse to not provide records. I was fishing for this: Any contract with the County Commissioners Association of Pennsylvania between the dates of January 1, 2020 to present.
Houser	RTK Request	I am requesting communications between Chester County and Michael Sage, Chief Information Officer of the County Commissioners Association of PA between the dates of January 1, 2020 to present. I prefer electronic documents. Records requested may	Chester County Open Records	Feb. 5, 2024	Chester County Open Records has reviewed its files and has located responsive records to your request.	granted	R000307-121423	Chester	Hit the jackpot with this one. Found evidence of every PA County that has Albert Sensors and how the PA DOS and the County Commissioners Association (Left Leaning) went to great lengths to push Albert Sensors on every county.

[illegible]